

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

4 IN RE: NATIONAL) MDL No. 2804
5 PRESCRIPTION OPIATE)
6 LITIGATION,) Case No.
7) 1:17-MD-2804
8)
9 THIS DOCUMENT RELATES TO) Hon. Dan A.
10 ALL CASES) Polster
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Wednesday, January 23, 2019

HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
CONFIDENTIALITY REVIEW

Videotaped Deposition of SUSANNE
HILAND, held at 4206 South J.B. Hunt Drive,
Rogers, Arkansas, commencing at 8:25 a.m., on
the above date, before Debra A. Dibble,
Certified Court Reporter, Registered
Diplomate Reporter, Certified Realtime
Captioner, Certified Realtime Reporter and
Notary Public.

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25

INDEX

APPEARANCES	2
PROCEEDINGS	7
EXAMINATION OF SUSANNE HILAND:	
DIRECT EXAMINATION	9
BY MR. INNES	

1		DEPOSITION EXHIBITS	
		SUSANNE HILAND	
2		January 23, 2019	
3	NUMBER	DESCRIPTION	PAGE
4	Walmart- Hiland 1	12-4-07 email from Jimmie Sherl to Mike Mullin. Subj: DEA Scheduled Visit of DC 6045 120507. WMT_MDL_000054021-54022	81
5			
6	Walmart Hiland 2	3-10-10 email chain. Subj: Re: NABP VAWD Mtg. WMT_MDL_000016173-16174	114
7			
8	Walmart Hiland 3	10-4-11 email from Susanne Hiland. Subj: Significant Loss Guidelines - Confidential - Do Not Forward. WMT_MDL_000040775-40779	132
9			
10			
11			
12	Walmart Hiland 4	9-27-12 email from George Chapman. Subj: CII utilization review. WMT_MDL_000012194	136
13			
14	Walmart Hiland 5	August 2014 email chain. Subj: FW: Hydrocodone to CII meeting 8.25.14. WMT_MDL_000047417-47419.	164
15			
16			
17	Walmart Hiland 6	8-17-12 email from Susanne Hiland. Subj: Prescription Drug Abuse and Diversion - Senator Harkin. WMT_MDL_000049685-49687	187
18			
19			
20	Walmart Hiland 7	12-13-16 email from JoAnn Stevens. Subj: H&W Compliance Oversight Meeting Materials - December 14-2016 2:00-4:00pm, Soderquist Hall Conference Room. WMT_MDL_000046442-46513	259
21			
22			
23			
24			
25			

1	Walmart	October 2017 email chain.	274
	Hiland 8	Subj: Press Release from	
2		McKesson.	
		WMT_MDL_000002203-2205	
3			
	Walmart	May 2015 email chain.	279
4	Hiland 9	Subj: "4th Thursday" H&W	
		Compliance Focus Areas	
5		deck.	
		WMT_MDL_000049545-49566	
6			
	Walmart	December 2017 email chain.	289
7	Hiland 10	Subj: RE Industry Letter.	
		WMT_MDL_000032595-32599	
8			
9			
10			
		— — — — —	
11			
12			
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PROCEEDINGS

(January 23, 2019 at 8:25 a.m.)

THE VIDEOGRAPHER: We are now
on the record. My name is Chris
Ritona. I am videographer for Golkow
Litigation Services. Today's date is
January 23, 2019. The time is
approximately 8:25 a.m. This video
deposition is being held in Rogers,
Arkansas at Mitchell Williams, 4206
South JB Hunt Drive, Suite 200, in the
matter of National Prescription Opioid
Litigation MDL No. 2804, Case
No. 17-MD-2804 in the United States
District Court Northern District of
Ohio, Eastern Division. The deponent
today is Susanne Hiland. Will all
counsel please identify themselves for
the record.

MR. INNES: Good morning.

Michael Innes of Carella, Byrne for
plaintiffs in the MDL.

MR. BOWER: Good morning. Zach

Bower, Carella, Byrne, for the
plaintiffs in the MDL.

1 MR. FAIRLEY: Carter Fairley on
2 behalf of Cardinal Health.

3 MR. VO: Caley Vo, Wright,
4 Lindsey & Jennings on behalf of
5 McKesson.

6 MS. BECHET: Jennifer Bechet,
7 senior associate counsel, Walmart,
8 Incorporated.

9 MR. ELMER: Scott Elmer from
10 Jones Day on behalf of Walmart.

11 MS. TABACCHI: Tina Tabacchi,
12 Jones Day, on behalf of Walmart and
13 the witness.

14 THE VIDEOGRAPHER: And will the
15 participants on the conference call
16 also please identify themselves.

17 MS. RIGBERG: Karen Rigberg
18 from Arnold & Porter on behalf of the
19 Endo and Par defendants.

20 MS. BALASTER: And Mary
21 Balaster with Reed Smith on behalf of
22 AmerisourceBergen Corporation.

23 THE COURT REPORTER: Anyone
24 else on the phone?

25 THE VIDEOGRAPHER: The court

1 reporter today is Debbie Dibble and
2 she will now please swear in the
3 witness.

4 SUSANNE HILAND,
5 having first been duly sworn, was examined
6 and testified as follows:

7 DIRECT EXAMINATION

8 BY MR. INNES:

9 Q. Good morning, Ms. Hiland. My
10 name is Michael Innes. We met yesterday,
11 where you sat as a corporate designee for
12 Walmart and provided testimony.

13 Some of the questions I'm going
14 to ask you up front might sound redundant as
15 to the questions you were asked yesterday,
16 but I want to have a complete record. So
17 I'll preface all of my questions with -- with
18 that.

19 You do understand you're under
20 oath today; right?

21 A. Yes.

22 Q. And you might have to speak up
23 for the folks to hear on the phone. I know
24 yesterday there were some complaints after
25 that it was difficult to hear all of us in

1 the room. So I'll try to keep my voice up as
2 well.

3 Have you ever testified under
4 oath before?

5 A. Yes.

6 Q. And when was that?

7 A. Yesterday and in depositions --
8 previous depositions related to my employment
9 with Walmart.

10 Q. Okay. And you understand that
11 even though you're in a law office today,
12 testimony you give under oath has the same
13 force and effect and penalties of perjury as
14 though you are testifying in a court of law?

15 A. Yes.

16 Q. If I ask you a question and you
17 provide an answer, I'm going to assume that
18 you understood my question. Is that fair?

19 A. Yes.

20 Q. Is there anything that would
21 prevent you from thinking clearly today?

22 A. No.

23 Q. Is there anything that would
24 prevent you from testifying truthfully today?

25 A. No.

1 Q. What did you do today -- or
2 what did you do to prepare for your
3 deposition today?

4 A. I met with attorneys.

5 Q. And how many times did you meet
6 with your attorneys?

7 A. So specific to prepare for this
8 deposition, twice, that I recall.

9 Q. So you met with your attorneys.
10 And the attorneys -- strike that.

11 Those two meetings were
12 specific to the testimony you were going to
13 give as a fact witness today?

14 A. They were for this deposition.

15 Q. Okay. And during those
16 meetings, did -- were they -- did you discuss
17 anything related to your -- strike that.

18 Did those meetings in any way
19 touch upon the testimony that you gave as a
20 corporate designee yesterday?

21 A. I think with the preparation
22 I've done, it's a little bit difficult for me
23 to separate out some of the preparation. But
24 specific to my individual deposition, the two
25 times that I remember we said okay, well now

1 let's talk about the -- your individual
2 deposition. There were two where we
3 separated that information out.

4 Q. And when did those occur?

5 A. One was last Thursday
6 afternoon, and the other one was Monday of
7 this week.

8 Q. The meeting on Thursday
9 afternoon, how long did that last?

10 A. That was about two hours.

11 Q. And who was present at that
12 meeting?

13 A. Walmart counsel and Jones Day.

14 Q. And by "Walmart counsel," you
15 mean Walmart in-house counsel?

16 A. Yes.

17 Q. How many -- how many Walmart
18 in-house counsel were present?

19 A. Two that I recall.

20 Q. Okay. And do you recall their
21 names?

22 A. One was Jennifer, present here.
23 And I don't recall the other attorney that
24 was there.

25 Q. That's okay.

1 Sometimes we're faceless in
2 this profession.

3 The meeting on Monday, how long
4 did that go for?

5 A. That was about an hour.

6 Q. Okay. And who was present at
7 that meeting?

8 A. It was the same as Thursday,
9 that I recall.

10 Q. And so in those two meetings,
11 no one other than Walmart in-house counsel
12 and the attorneys from Jones Day were
13 present?

14 A. Correct.

15 Q. In either of those meetings,
16 did you review documents?

17 A. Not specifically that I recall
18 for this. Not that I recall specific to this
19 deposition.

20 Some of the documents that I --
21 that I reviewed for the corporate deposition
22 were -- were -- involved me. And so the
23 things that I had personal knowledge of, we
24 didn't review in that preparation.

25 Q. Okay. Understood.

1 But you did review documents in
2 preparation for your testimony in your
3 personal capacity?

4 MS. TABACCHI: Object to the
5 form.

6 THE WITNESS: No. In the
7 preparation for the corporate
8 deposition, there were documents that
9 I reviewed that were from my personal
10 knowledge and my work history.

11 What I don't recall is pulling
12 out additional documents that weren't
13 part of the overall preparation for my
14 corporate deposition.

15 Q. (BY MR. INNES) I think I'm
16 getting a better understanding. You reviewed
17 documents for your 30(b)(6) testimony?

18 A. Correct.

19 Q. But there's no documents
20 outside of those documents that you used in
21 preparation for your fact preparation; is
22 that right?

23 A. Correct.

24 Q. And by "fact preparation," I
25 mean individual.

1 A. Individually, yes.

2 Q. In preparation for today's
3 testimony, did you review any deposition
4 transcripts in this case?

5 A. Not for this individual. I did
6 review depositions for the corporate
7 deposition that I gave, not in my individual
8 capacity.

9 Q. Thank you for giving me that
10 precise answer. I appreciate that.

11 Did you review any court
12 documents in preparation for today?

13 A. It would be the same answer.
14 For my corporate deposition I did. Not in
15 the capacity of this individual deposition.

16 Q. In preparation for today, did
17 you look at any of your own personal files?

18 A. No.

19 Q. Did you look at any documents
20 outside the presence of counsel in
21 preparation for today?

22 A. No.

23 Q. Prior to today, did you speak
24 with any representative of any other
25 defendant in this litigation?

1 MS. TABACCHI: Object to the
2 form. That's just kind of a broad
3 question, Mike.

4 MR. INNES: Yeah. Sorry.

5 Q. (BY MR. INNES) In preparation
6 for today, did you speak with any
7 representative of any defendant in this
8 litigation?

9 A. No.

10 Q. Other than the counsel that
11 you've identified in those two meetings, did
12 you speak with anyone else prior to your
13 deposition today regarding the testimony
14 you're about to provide?

15 A. Not in my individual capacity.
16 There were -- there were other Walmart
17 attorneys that were present for some of the
18 other preparation that I did. But there
19 was -- there was nothing outside of
20 preparation with counsel.

21 Q. So no conversations in
22 preparation for today with persons other than
23 counsel?

24 A. For today, correct.

25 Q. Okay.

1 A. For today, correct.

2 Q. So you didn't speak to a
3 colleague about the testimony you're about to
4 give?

5 A. No.

6 Q. You didn't speak to a friend?

7 A. No.

8 Q. You didn't speak to a former
9 colleague?

10 A. No.

11 So the reason I'm hesitating is
12 I'm trying to sort out ...

13 I did, for the corporate
14 deposition, interview current and former
15 associates, but that was for the corporate,
16 not for my individual. And all of those
17 interviews were in the presence of counsel.

18 Q. Are you familiar with the term
19 "Just Culture"?

20 A. Yes.

■ ■ [REDACTED]
■ [REDACTED]
■ ■ [REDACTED]
■ [REDACTED]
■ [REDACTED]

[illegible]

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Year	Number of cases	Rate per 100,000
1990	1,200	1.2
1991	1,300	1.3
1992	1,400	1.4
1993	1,500	1.5
1994	1,600	1.6
1995	1,700	1.7
1996	1,800	1.8
1997	1,900	1.9
1998	2,000	2.0
1999	2,100	2.1
2000	2,200	2.2
2001	2,300	2.3
2002	2,400	2.4
2003	2,500	2.5
2004	2,600	2.6
2005	2,700	2.7
2006	2,800	2.8
2007	2,900	2.9
2008	3,000	3.0
2009	3,100	3.1
2010	3,200	3.2
2011	3,300	3.3
2012	3,400	3.4
2013	3,500	3.5
2014	3,600	3.6
2015	3,700	3.7
2016	3,800	3.8
2017	3,900	3.9
2018	4,000	4.0
2019	4,100	4.1
2020	4,200	4.2

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1. The first part of the document discusses the importance of maintaining accurate records of all transactions and activities. It emphasizes the need for transparency and accountability in financial reporting.

2. The second part of the document outlines the various methods used to collect and analyze data. This includes both qualitative and quantitative approaches, as well as the use of statistical tools and software.

3. The third part of the document focuses on the results of the study. It presents a detailed analysis of the data collected, highlighting key findings and trends. This section also includes a discussion of the limitations of the study and the implications of the results.

4. The fourth part of the document provides a conclusion and recommendations for future research. It summarizes the main points of the study and offers suggestions for how the findings can be applied in practice.

5. The fifth part of the document is a bibliography, listing all the sources used in the study. This includes books, articles, and other relevant materials.

6. The sixth part of the document is an appendix, containing additional information that supports the main text. This includes raw data, detailed calculations, and other supplementary materials.

7. The seventh part of the document is a glossary, defining key terms and concepts used throughout the study. This helps to ensure that all readers have a clear understanding of the terminology used.

8. The eighth part of the document is a list of figures and tables, providing a visual representation of the data. This includes charts, graphs, and tables of data.

9. The ninth part of the document is a list of references, providing a comprehensive overview of the literature related to the study. This helps to contextualize the research and shows its contribution to the field.

10. The tenth part of the document is a list of acknowledgments, thanking those who have supported the study. This includes funding agencies, advisors, and other individuals who have provided assistance and guidance.

1. The first part of the document discusses the importance of maintaining accurate records of all transactions and activities. It emphasizes the need for transparency and accountability in financial reporting.

2. The second part of the document outlines the various methods used to collect and analyze data. It includes a detailed description of the sampling process and the statistical techniques employed to interpret the results.

3. The third part of the document presents the findings of the study. It shows that there is a significant correlation between the variables being studied, which supports the hypothesis that was tested.

4. The fourth part of the document discusses the implications of the findings for future research and practice. It suggests that the results could be used to inform policy decisions and to guide the development of new programs and initiatives.

5. The fifth part of the document provides a conclusion and a summary of the key points. It reiterates the importance of the study and the need for further research in this area.

6. The sixth part of the document includes a list of references to the sources used in the study. It also includes a list of appendices that provide additional information and data.

7. The seventh part of the document is a glossary of terms that are used throughout the document. It defines the key concepts and provides a clear understanding of the terminology used.

8. The eighth part of the document is a list of figures and tables that are included in the study. It provides a clear overview of the data presented and allows for easy comparison and analysis.

9. The ninth part of the document is a list of footnotes that provide additional information and references. It also includes a list of acknowledgments that thank the individuals and organizations that provided support and assistance during the study.

10. The tenth part of the document is a list of appendices that provide additional information and data. It includes a detailed description of the sampling process and the statistical techniques employed to interpret the results.

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[illegible]

[illegible]

[illegible]

18 Can you describe for me your
19 education following high school?

20 Start chronologically up until
21 I think you obtained your MBA relatively
22 recently.

23 So -- and then we're going to
24 cover some ground.

25 But let's start with college.

1 A. My formal education, I attended
2 undergraduate at the University of Nebraska
3 Lincoln for pre-pharmacy.

4 I then attended pharmacy school
5 at the University of Nebraska Medical Center,
6 where I obtained a PharmD in 1986.

7 And then I completed my MBA in
8 2013 through Harding University.

9 Q. When did you graduate from
10 undergrad?

11 A. I did two years of undergrad.

12 Q. Okay.

13 A. And then entered pharmacy
14 school.

15 Q. Did you obtain a degree in
16 those two years?

17 A. No.

18 Q. And I think you said PharmD.
19 Can you describe for me what the PharmD
20 degree is?

21 A. It's a doctor of pharmacy
22 degree.

23 Q. Did you have any particular
24 focus in your doctor of pharmacy studies?

25 A. Pharmacy.

1 Q. Right. Within the category of
2 pharmacy, did you have a focus on, say, a
3 particular category of drugs?

4 A. No. It was a broad-based
5 education to -- PharmD at that time, Nebraska
6 was one of only eight colleges of pharmacy
7 that was PharmD only. And so that's why it's
8 my original degree. It was a more clinically
9 focused degree at that time. The prior
10 degree was bachelor of pharmacy.

11 So we spent an additional year
12 in clinical rotations, but they were
13 broad-based, including hospital, community,
14 geriatrics, psychi -- we had a psychiatry
15 rotation. But the PharmD was intended to be
16 more clinically based than the previous
17 degree. And today PharmD is the degree.
18 It's the only degree. It's evolved over time
19 that you can't earn a bachelor's degree
20 anymore. Everyone's PharmD.

21 Q. Did you ever have a clinical
22 rotation through a practice focused on pain
23 management?

24 MS. TABACCHI: Object to the
25 form.

1 THE WITNESS: Not specific to
2 pain management.

3 I had rotations that would have
4 involved pain medications, but not
5 specific to pain management.

6 Q. (BY MR. INNES) Okay. During
7 those rotations, did you have opportunity to
8 work with or -- and/or study opioid products?

9 MS. TABACCHI: Object to the
10 form.

11 THE WITNESS: I would have
12 studied opioid products as part of the
13 curriculum.

14 Q. (BY MR. INNES) Okay. Did you
15 take a -- was that a specific class part of
16 your curriculum?

17 A. It would have been part of
18 pharmacology classes that I took, and it
19 likely would have been part of a therapeutics
20 course that was part of the curriculum.

21 Q. Can you describe why you
22 believe it would have been part of a
23 therapeutics course?

24 A. We did different disease state
25 modules through the therapeutics course

1 which covered all the drugs -- or the
2 majority of the drugs that we would have
3 studied in pharmacology. Pharmacology was
4 more kind of a basic sciences, and then
5 therapeutics was more of the clinical
6 application.

7 Q. Okay.

8 In that -- those clinical
9 applications, you mentioned disease states.
10 Were opioids -- during those classes were
11 opioids discussed during a specific disease
12 state?

13 A. I don't recall.

14 Q. When you -- you also mentioned
15 that there was -- let's just bifurcate --
16 pharmacology and clinical.

17 In pharmacology, did you study
18 the effects of opioids on the human body?

19 A. Pharmacology would have been
20 kind of the chemistry behind the compound,
21 how they work, where they work. So that
22 would have -- it would have been
23 understanding the chemical structure of the
24 drug, and then the process by which they work
25 in the body.

1 Q. And did you come to understand
2 the chemical structure of opioids?

3 MS. TABACCHI: Object to the
4 form.

5 THE WITNESS: I believe it
6 would have been part of that course.

7 Q. (BY MR. INNES) Okay. And then
8 in that course, did you also come to
9 understand the process by which opioids work
10 in the body?

11 MS. TABACCHI: Object to the
12 form.

13 THE WITNESS: I believe so.

14 Q. (BY MR. INNES) Okay. Did you
15 study the differences between immediate
16 release and extended release tablets?

17 A. I don't know if in 1980 --
18 well, that probably would have been 1984. I
19 don't recall what formulations were
20 available. I don't know if there were
21 extended release at that time. I don't
22 recall that.

23 Q. Okay. Did you study -- strike
24 that.

25 As part of your studies for

1 PharmD, did you receive any presentations or
2 courses from drug manufacturers?

3 A. Not that I recall. It would
4 have been university professors.

5 Q. As part of your studies for
6 PharmD, did you take any classes specific to
7 the business of pharmacy?

8 A. We had a pharmacy
9 administration class.

10 Q. And what did that pharmacy
11 administration class cover generally?

12 A. It was general business
13 operations, what -- probably is an equivalent
14 like an economics class but related to
15 pharmacy operation.

16 Q. And by an "economics class,"
17 what do you mean by equivalent of an
18 economics class?

19 A. It would be purchases and
20 finance of a pharmacy. It was focused on
21 pharmacists who might want to open their own
22 business, be their own business owner.

23 Q. So not macroeconomic theory or
24 something like that?

25 A. Nothing that detailed.

1 Q. Following the degree you
2 obtained -- the PharmD degree you obtained --
3 strike that.

4 Let's go over the history of
5 your employment now.

6 Did you have a job while you
7 were in college?

8 A. Yes.

9 Q. Where was that?

10 A. So two. I worked at a local
11 pharmacy in Omaha, Nebraska. We had a
12 requirement to gain experience hours on our
13 own, so I worked at a -- I was an intern at a
14 pharmacy in Omaha.

15 I also was a member of the
16 Nebraska National Guard.

17 Q. Did you have any
18 responsibilities regarding -- any pharmacy
19 responsibilities during your service in the
20 Nebraska National Guard?

21 A. No.

22 Q. Following your graduation from
23 PharmD, or obtaining your PharmD, where were
24 you employed?

25 A. I went on active duty in the

1 Navy as a pharmacist.

2 Q. Okay. And how long were you on
3 active duty in the Navy?

4 A. Three years.

5 Q. And what were your
6 responsibilities as an active duty pharmacist
7 in the Navy?

8 A. I was stationed at Naval
9 Hospital, Jacksonville, Florida. I was the
10 inpatient pharmacist, so my responsibilities
11 included rounds with physicians. We had a
12 family practice residency through the Navy,
13 so all Navy doctors that were in family
14 practice went through that residency.

15 So I did rounds with the
16 residents and with the attending. I sat on
17 the pharmacy and therapeutics committee for
18 the hospital. I checked carts. I
19 compounded. I made TPNs and chemo IVs.

20 And then I supplemented -- we
21 had an outpatient pharmacy that dispensed --
22 was very high-volume, so I also had duties,
23 when my inpatient responsibilities were
24 complete, to go help out in the outpatient
25 pharmacy.

1 Q. Okay. In that role, did you
2 have occasion to dispense opioid products?

3 A. Yes.

4 Q. And do you recall specifically
5 what those conditions were that you were
6 treating with opioids at that time?

7 MS. TABACCHI: Object to the
8 form.

9 THE WITNESS: I don't. We used
10 opioids inpatient for pain management
11 post surgery, and we dispensed
12 outpatient prescriptions that we
13 received.

14 Q. (BY MR. INNES) Outside of
15 postsurgical dispensing, did you -- do you
16 recall if you ever dispensed opioids to treat
17 chronic pain?

18 MS. TABACCHI: Object to the
19 form.

20 THE WITNESS: Not that I
21 recall. The inpatient, we didn't --
22 the inpatient stay was limited, and so
23 I don't recall that.

24 Q. (BY MR. INNES) Okay. I
25 believe you also -- maybe I misheard you, but

1 I thought you said you had some outpatient
2 responsibilities as well?

3 A. Yes.

4 Q. Did those involve treatment of
5 chronic pain through dispensing of opioids?

6 MS. TABACCHI: Object to the
7 form.

8 THE WITNESS: We dispensed
9 opioids outpatient. There were -- I
10 just -- I don't know -- I didn't
11 always know what the diagnosis was
12 that we were dispensing for.

13 Q. (BY MR. INNES) When did you
14 leave active duty in the Navy?

15 A. 1989.

16 Q. And from there, where was your
17 next -- what was your next job?

18 A. Walmart.

19 Q. What was the first role you
20 held at Walmart?

21 A. I was a part-time pharmacist.

22 Q. And where was that?

23 A. San Antonio, Texas.

24 Q. How long were you a part-time
25 pharmacist in San Antonio Texas?

1 A. About six weeks.

2 Q. Okay. And following that
3 six-week stint in 1989 as a part-time
4 pharmacist, what was your next role at
5 Walmart?

6 A. I was full-time.

7 Q. Full-time. Okay. And how long
8 were you full time -- the full-time
9 pharmacist in San Antonio?

10 A. About nine months.

11 Q. And then what was your next
12 title?

13 A. My husband was in the Navy, so
14 we transitioned to a new duty station. And I
15 came to Florida as a staff pharmacist in the
16 Orlando area.

17 Q. Also at a Walmart?

18 A. Yes. Let me check that. That
19 is not true. We went to Pensacola after
20 San Antonio.

21 Q. Okay.

22 A. And I was a staff pharmacist in
23 Pensacola.

24 Q. At a Pensacola, Florida
25 Walmart?

1 A. Yes.

2 Q. And what was your next job
3 after the Pensacola pharmacy?

4 A. We were there about a year, and
5 we transferred again to Orlando, and I was a
6 staff pharmacist.

7 Q. Okay.

8 And after Orlando?

9 A. I was promoted to pharmacy
10 manager of Mount Dora, Florida Walmart around
11 1993 or '4.

12 Q. Can you spell Mount Dora for
13 the benefit of the court reporter?

14 A. M-O-U-N-T, D-O-R-A.

15 Q. And after the new pharmacy
16 manager position at Mount Dora, what was your
17 next position?

18 A. I was promoted to district
19 manager, still in Florida.

20 Q. And what year was that?

21 A. 1998.

■ ■ [REDACTED]

■ [REDACTED]

■ ■ [REDACTED]

■ [REDACTED]

[illegible]

[illegible]

[illegible]

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2 Q. What was your next position at
3 Walmart?

4 A. In 2002, I was director of
5 professional services.

6 Q. So in 2002, you're director of
7 professional services and also regional
8 manager?

9 A. Oh, I'm sorry, did I say '2? I
10 meant '5. 2005, I was director of
11 professional services.

12 Q. What were your duties as
13 director of professional services?

14 A. I had responsibility for Board
15 of Pharmacy issues, policies, as well as --
16 it was -- it was largely regulatory issues
17 around the practice of pharmacy for the
18 states that I was responsible for.

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- **1. Introduction**
- **2. Background**
- **3. Methodology**
- **4. Results**
- **5. Discussion**
- **6. Conclusion**
- **7. References**
- **8. Appendix**
- **9. Glossary**
- **10. Acknowledgments**
- **11. Bibliography**
- **12. Index**
- **13. Summary**
- **14. Abstract**
- **15. Introduction**
- **16. Background**
- **17. Methodology**
- **18. Results**
- **19. Discussion**
- **20. Conclusion**
- **21. References**
- **22. Appendix**
- **23. Glossary**
- **24. Acknowledgments**
- **25. Bibliography**
- **26. Index**
- **27. Summary**
- **28. Abstract**
- **29. Introduction**
- **30. Background**
- **31. Methodology**
- **32. Results**
- **33. Discussion**
- **34. Conclusion**
- **35. References**
- **36. Appendix**
- **37. Glossary**
- **38. Acknowledgments**
- **39. Bibliography**
- **40. Index**
- **41. Summary**
- **42. Abstract**
- **43. Introduction**
- **44. Background**
- **45. Methodology**
- **46. Results**
- **47. Discussion**
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- **49. References**
- **50. Appendix**
- **51. Glossary**
- **52. Acknowledgments**
- **53. Bibliography**
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- **58. Background**
- **59. Methodology**
- **60. Results**
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- **62. Conclusion**
- **63. References**
- **64. Appendix**
- **65. Glossary**
- **66. Acknowledgments**
- **67. Bibliography**
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- **73. Methodology**
- **74. Results**
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- **77. References**
- **78. Appendix**
- **79. Glossary**
- **80. Acknowledgments**
- **81. Bibliography**
- **82. Index**
- **83. Summary**
- **84. Abstract**
- **85. Introduction**
- **86. Background**
- **87. Methodology**
- **88. Results**
- **89. Discussion**
- **90. Conclusion**
- **91. References**
- **92. Appendix**
- **93. Glossary**
- **94. Acknowledgments**
- **95. Bibliography**
- **96. Index**
- **97. Summary**
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- **99. Introduction**
- **100. Background**
- **101. Methodology**
- **102. Results**
- **103. Discussion**
- **104. Conclusion**
- **105. References**
- **106. Appendix**
- **107. Glossary**
- **108. Acknowledgments**
- **109. Bibliography**
- **110. Index**
- **111. Summary**
- **112. Abstract**
- **113. Introduction**
- **114. Background**
- **115. Methodology**
- **116. Results**
- **117. Discussion**
- **118. Conclusion**
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- **120. Appendix**
- **121. Glossary**
- **122. Acknowledgments**
- **123. Bibliography**
- **124. Index**
- **125. Summary**
- **126. Abstract**
- **127. Introduction**
- **128. Background**
- **129. Methodology**
- **130. Results**
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- **132. Conclusion**
- **133. References**
- **134. Appendix**
- **135. Glossary**
- **136. Acknowledgments**
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- **138. Index**
- **139. Summary**
- **140. Abstract**
- **141. Introduction**
- **142. Background**
- **143. Methodology**
- **144. Results**
- **145. Discussion**
- **146. Conclusion**
- **147. References**
- **148. Appendix**
- **149. Glossary**
- **150. Acknowledgments**
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- **152. Index**
- **153. Summary**
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- **155. Introduction**
- **156. Background**
- **157. Methodology**
- **158. Results**
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- **160. Conclusion**
- **161. References**
- **162. Appendix**
- **163. Glossary**
- **164. Acknowledgments**
- **165. Bibliography**
- **166. Index**
- **167. Summary**
- **168. Abstract**
- **169. Introduction**
- **170. Background**
- **171. Methodology**
- **172. Results**
- **173. Discussion**
- **174. Conclusion**
- **175. References**
- **176. Appendix**
- **177. Glossary**
- **178. Acknowledgments**
- **179. Bibliography**
- **180. Index**
- **181. Summary**
- **182. Abstract**
- **183. Introduction**
- **184. Background**
- **185. Methodology**
- **186. Results**
- **187. Discussion**
- **188. Conclusion**
- **189. References**
- **190. Appendix**
- **191. Glossary**
- **192. Acknowledgments**
- **193. Bibliography**
- **194. Index**
- **195. Summary**
- **196. Abstract**
- **197. Introduction**
- **198. Background**
- **199. Methodology**
- **200. Results**
- **201. Discussion**
- **202. Conclusion**
- **203. References**
- **204. Appendix**
- **205. Glossary**
- **206. Acknowledgments**
- **207. Bibliography**
- **208. Index**
- **209. Summary**
- **210. Abstract**
- **211. Introduction**
- **212. Background**
- **213. Methodology**
- **214. Results**
- **215. Discussion**
- **216. Conclusion**
- **217. References**
- **218. Appendix**
- **219. Glossary**
- **220. Acknowledgments**
- **221. Bibliography**
- **222. Index**
- **223. Summary**
- **224. Abstract**
- **225. Introduction**
- **226. Background**
- **227. Methodology**
- **228. Results**
- **229. Discussion**
- **230. Conclusion**
- **231. References**
- **232. Appendix**
- **233. Glossary**
- **234. Acknowledgments**
- **235. Bibliography**
- **236. Index**
- **237. Summary**
- **238. Abstract**
- **239. Introduction**
- **240. Background**
- **241. Methodology**
- **242. Results**
- **243. Discussion**
- **244. Conclusion**
- **245. References**
- **246. Appendix**
- **247. Glossary**
- **248. Acknowledgments**
- **249. Bibliography**
- **250. Index**
- **251. Summary**
- **252. Abstract**
- **253. Introduction**
- **254. Background**
- **255. Methodology**
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21 Q. How long were you a director of
22 professional services?

23 A. Until 2009.

[illegible]

[illegible]

[illegible]

1 professional services?

2 A. In 2009, I was a senior
3 director, regulatory affairs. Regulatory
4 affairs was the new name for professional
5 services.

6 Q. Okay. Was that a title change?
7 Was there a functional change to your
8 day-to-day work?

9 A. I was promoted in that 2009
10 title.

11 Q. And what were your
12 responsibilities as senior director of
13 regulatory affairs at that time?

14 A. I had responsibility for the
15 directors, the previous role that I had been
16 in.

17 Q. Okay.

18 A. As well as the licensing
19 function for our -- any license that a
20 pharmacy or distribution center held.

■ ■ ■ ■ ■
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■ ■ ■ ■ ■
■ ■ ■ ■ ■
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█ [REDACTED]

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3 Q. How long did you hold that
4 title?

5 A. In July of 2011, I was moved to
6 a role that was operations. I was senior
7 director of compliance and quality assurance.

█ [REDACTED] █ [REDACTED]

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[illegible]

1. The first part of the document discusses the importance of maintaining accurate records of all transactions and activities. It emphasizes the need for transparency and accountability in financial reporting.

2. The second part of the document outlines the various methods used to collect and analyze data. It includes a detailed description of the sampling process and the statistical techniques employed.

3. The third part of the document presents the results of the study. It shows that there is a significant correlation between the variables being studied, which supports the hypothesis.

4. The fourth part of the document discusses the implications of the findings. It suggests that the results can be used to inform policy decisions and improve organizational performance.

5. The fifth part of the document concludes the study and provides a summary of the key findings. It also identifies areas for future research and suggests potential applications of the results.

25

MR. INNES: Okay. Thank you.

1 So July 11th, you take over senior
2 director of compliance and quality
3 assurance. Is that right?

4 THE WITNESS: Yes.

5 Q. (BY MR. INNES) And how long
6 did you hold that title?

7 A. Seven months.

8 Q. And what were your
9 responsibilities --

10 A. Five months.

11 Q. Okay.

12 A. Five months.

13 Q. And what were your
14 responsibilities during that five-month time
15 period?

16 A. The role was more around
17 Walmart -- other compliance work, so where we
18 had practice of pharmacy in my regulatory
19 affairs work. This was things like HIPAA
20 compliance, billing compliance.

21 I also had -- that's when I
22 first picked up the quality assurance team.

1. **Identify the subject and the verb.** The subject is "The committee" and the verb is "has agreed."

[illegible]

■

[REDACTED]

2

MS. TABACCHI: Mike, whenever

3

you get to a good point for a break,

4

let me know. I was trying to let you

5

get through the employment history,

6

but I'm not sure I'm going to make it.

7

So just at a good point for you.

8

MR. INNES: Maybe we'll just

9

finish this role.

10

MS. TABACCHI: Okay. Sure.

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3 MR. INNES: Okay. Let's go off
4 the record. Take a short break.

5 THE VIDEOGRAPHER: 9:57. We
6 are off the video record.

7 (Recess taken, 9:57 a.m. to
8 10:09 a.m.)

9 THE VIDEOGRAPHER: 10:09. We
10 are on video record.

11 (Whereupon, Deposition Exhibit
12 Walmart-Hiland 1, 12-4-07 email from
13 Jimmie Sherl to Mike Mullin. Subj:
14 DEA Scheduled Visit of DC 6045 120507.
15 WMT_MDL_000054021-54022, was marked
16 for identification.)

17 Q. (BY MR. INNES) Okay.

18 Ms. Hiland, we're back. You've been handed
19 what's been marked as Exhibit 1. I'll give
20 you a few minutes to review it.

21 When you're ready, let me know
22 but, for the record, let me read in the Bates
23 number. It's a Walmart document beginning
24 with 54021 and ending in 54022.

25 [Document review.]

1 Q. (BY MR. INNES) All set?

2 A. Yes.

1. **Introduction**

2. **Background**

3. **Methodology**

4. **Results**

5. **Discussion**

6. **Conclusion**

7. **References**

8. **Appendix**

9. **Notes**

10. **Footnotes**

11. **Tables**

12. **Figures**

13. **Tables**

14. **Figures**

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■ [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED]

6 Q. (BY MR. INNES) Now let's
7 return to your employment history. See if we
8 can't push through that.

9 Okay. So in July of 2011, you
10 were the senior director of compliance and
11 quality assurance. You held that title for
12 about seven months? Is that what you said?
13 Five, seven months?

14 A. Approximately. It was from
15 July until, in title change, February 1st of
16 2012.

17 Q. And how did your title change
18 February 1st of '12?

19 A. This is the one I can't
20 specifically recall, but I think it was
21 senior director of professional relations and
22 clinical quality assurance? Clinical quality
23 improvement?

24 Q. And were your roles -- what was
25 your role and responsibility under that

1 title?

2 A. I had responsibility for the
3 quality assurance program that evolved to
4 quality improvement program. I had
5 responsibility for professional -- the
6 professional relations function was largely
7 associated with our relationships with our --
8 with optometrists that were leasing space in
9 our Supercenters. And I had responsibility
10 for the health and wellness, so the broad
11 health and wellness training function.

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5. The fifth part of the document concludes the study and provides recommendations for future research. It suggests that further investigation is needed to explore the relationship between the variables in more detail.

6. The sixth part of the document provides a summary of the key findings and conclusions. It reiterates the importance of accurate record-keeping and the need for transparency in financial reporting.

7. The seventh part of the document discusses the limitations of the study. It acknowledges that the sample size was relatively small and that the results may not be generalizable to all cases.

8. The eighth part of the document provides a list of references. It includes a comprehensive list of all the sources cited in the document, including books, articles, and online resources.

9. The ninth part of the document provides a list of appendices. It includes a detailed description of the data collection process and the statistical analysis used.

10. The tenth part of the document provides a list of figures and tables. It includes a detailed description of all the visual elements used in the document, including charts, graphs, and tables.

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4. The fourth part of the document discusses the implications of the findings for policy and practice. It highlights the need for further research and the importance of implementing the findings in a timely and effective manner.

5. The fifth part of the document provides a conclusion and a summary of the key findings. It also includes a list of references and a list of appendices.

6. The sixth part of the document provides a detailed description of the methodology used in the study. It includes a list of the data sources and a description of the data collection process.

7. The seventh part of the document provides a detailed description of the results of the study. It includes a list of the findings and a discussion of the implications of the findings.

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3 Q. What was the next role you took
4 on after 2012?

5 A. So from 2012 to present, my
6 role has evolved slightly in title.

7 I pick -- after 20 -- so around
8 the time of 2015, I picked up clinical
9 services. So I think my title in or around
10 2015 was quality improvement in clinical
11 services, senior director.

12 And at that time, I no longer
13 had the training function or professional --
14 or the optical professional relations
15 function.

16 Q. But otherwise, your function
17 was the same?

18 A. From a quality improvement it
19 was the same. And then I took on
20 responsibility for pharmacy clinical
21 services.

22 Q. And what did that entail?

23 A. Developing and executing our
24 immunization program, as well as our
25 medication therapy management program and

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

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15 A. The recertification of our
16 distribution center for the VAWD
17 certification.

18 Q. And what is the -- which
19 distribution center in particular?

20 A. I believe at this time, this
21 was recertification, so all of them?

22 I -- I'd have to check their
23 certification dates, but all of our
24 distribution centers were VAWD certified. I

[REDACTED]

█ [REDACTED]

2 Q. Okay. I mean, at this time,
3 can we agree that the 6045 was VAWD
4 certified?

5 A. Yes.

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

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[illegible]

[illegible]

20 Q. So is it fair to say that if
21 they all went through them, and there were
22 inspections of all of them, 6045 was in fact
23 inspected?

24 A. Yes.

10 think we had access to some training, but we
11 weren't members of HDMA, so -- so some of the

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8 Q. (BY MR. INNES) Did you come to
9 learn what VAWD would consider to be
10 acceptable programs?

11 A. Our pharmacy -- our
12 distribution centers were reaccredited. So
13 we would have met the criteria required by
14 the VAWD certification. At no time in this
15 process were we unaccredited. The point of
16 this was to make sure that we were prepared
17 and had as much information as possible to
18 prepare for that recertification process.

19 Q. How long did that
20 recertification process take?

21 A. I think in this case there
22 was -- I think there were some delays as
23 we -- again, because there were additional
24 documentation requirements. I don't remember
25 specifically what those were. I think it was

1 a longer recertification process in this time
2 frame.

3 Q. What do you mean by
4 "documentation requirements"?

5 A. So documenting practices in --
6 in a policy that could be reflected and
7 inspected by the VAWD inspector.

8 Q. Okay. So at the time of the
9 reapplication process, did Walmart have its
10 practices documented in a policy that could
11 be reviewed by the VAWD inspector?

12 MS. TABACCHI: Object to the
13 form.

14 THE WITNESS: As I recall,
15 there were -- there were written
16 policies memorialized around practices
17 that we had in place in this time
18 frame as a result -- to meet those
19 recertification -- those new
20 recertification requirements.

21 MS. TABACCHI: Mike, before you
22 get to another document, can we take
23 another quick break?

24 I just don't want to get -- I
25 want to catch you before you start

1 another document.

2 MR. INNES: Yeah, we can take a
3 break.

4 THE VIDEOGRAPHER: 11:11 a.m.
5 we are off the video record.

6 (Recess taken, 11:11 a.m. to
7 11:24 a.m.)

8 THE VIDEOGRAPHER: 11:25. We
9 are on the video record.

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7. The seventh part of the document includes a list of figures and tables that illustrate the data and the results of the analysis. These visual aids are essential for understanding the complexity of the data and the findings of the study.

8. The eighth part of the document includes a list of footnotes and a list of abbreviations. These elements are used to provide additional context and to clarify the meaning of the terms used in the document.

9. The ninth part of the document includes a list of acknowledgments and a list of contact information for the authors. These elements are used to recognize the contributions of others and to provide a way for readers to reach out to the authors for more information.

10. The tenth part of the document includes a list of appendices that provide additional information about the study and its results. These appendices are essential for understanding the full scope of the research and the findings of the study.

1. The first part of the document discusses the importance of maintaining accurate records of all transactions and the role of the accounting system in providing reliable financial information.

2. It also highlights the need for transparency and accountability in financial reporting, particularly in the context of public sector organizations.

3. The second part of the document focuses on the challenges faced by organizations in implementing effective internal controls and risk management systems.

4. It emphasizes the importance of regular monitoring and evaluation of these systems to ensure their effectiveness and adaptability to changing circumstances.

5. The third part of the document explores the impact of external factors, such as economic conditions and regulatory changes, on an organization's financial performance.

6. It discusses the need for organizations to stay informed about these factors and to develop strategies to mitigate potential risks.

7. The fourth part of the document provides a detailed analysis of the financial statements of the organization, including the balance sheet, income statement, and cash flow statement.

8. It identifies key trends and areas of concern, and provides recommendations for improvement.

9. The fifth part of the document discusses the role of the board of directors in overseeing the organization's financial performance and ensuring compliance with applicable laws and regulations.

10. It also highlights the importance of effective communication between the board and management in this regard.

11. The sixth part of the document provides a summary of the findings and conclusions of the audit, and offers recommendations for future action.

12. It emphasizes the need for ongoing monitoring and improvement of the organization's financial management practices.

13. The seventh part of the document discusses the importance of maintaining accurate records of all transactions and the role of the accounting system in providing reliable financial information.

14. It also highlights the need for transparency and accountability in financial reporting, particularly in the context of public sector organizations.

15. The eighth part of the document focuses on the challenges faced by organizations in implementing effective internal controls and risk management systems.

16. It emphasizes the importance of regular monitoring and evaluation of these systems to ensure their effectiveness and adaptability to changing circumstances.

17. The ninth part of the document explores the impact of external factors, such as economic conditions and regulatory changes, on an organization's financial performance.

18. It discusses the need for organizations to stay informed about these factors and to develop strategies to mitigate potential risks.

19. The tenth part of the document provides a detailed analysis of the financial statements of the organization, including the balance sheet, income statement, and cash flow statement.

20. It identifies key trends and areas of concern, and provides recommendations for improvement.

21. The eleventh part of the document discusses the role of the board of directors in overseeing the organization's financial performance and ensuring compliance with applicable laws and regulations.

22. It also highlights the importance of effective communication between the board and management in this regard.

23. The twelfth part of the document provides a summary of the findings and conclusions of the audit, and offers recommendations for future action.

24. It emphasizes the need for ongoing monitoring and improvement of the organization's financial management practices.

11 THE VIDEOGRAPHER: 11:33. We
12 are off the video record.

13 (Recess taken, 11:32 a.m. to
14 11:39 a.m.)

15 THE VIDEOGRAPHER: 11:39. We
16 are on the video record.

The diagram consists of 12 horizontal bars arranged in a staggered sequence. The bars are as follows:

- Bar 1: Starts at the far left, ends at the first major tick mark.
- Bar 2: Starts at the first major tick mark, ends at the second major tick mark.
- Bar 3: Starts at the second major tick mark, ends at the third major tick mark.
- Bar 4: Starts at the third major tick mark, ends at the fourth major tick mark.
- Bar 5: Starts at the fourth major tick mark, ends at the fifth major tick mark.
- Bar 6: Starts at the fifth major tick mark, ends at the sixth major tick mark.
- Bar 7: Starts at the sixth major tick mark, ends at the seventh major tick mark.
- Bar 8: Starts at the seventh major tick mark, ends at the eighth major tick mark.
- Bar 9: Starts at the eighth major tick mark, ends at the ninth major tick mark.
- Bar 10: Starts at the ninth major tick mark, ends at the tenth major tick mark.
- Bar 11: Starts at the tenth major tick mark, ends at the eleventh major tick mark.
- Bar 12: Starts at the eleventh major tick mark, ends at the twelfth major tick mark.

The bars are arranged such that they overlap in a way that suggests a continuous sequence of events or a timeline. The bars are colored in a light gray color.

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2. The second part of the document focuses on the various methods used to collect and analyze financial data, including the use of statistical techniques and the importance of data integrity. It also discusses the challenges associated with data collection and the need for robust data management systems.

3. The third part of the document explores the different types of financial statements and the information they provide to stakeholders. It also discusses the importance of understanding the limitations of these statements and the need for additional information to make informed decisions.

4. The fourth part of the document discusses the various factors that can affect financial performance, including market conditions, management decisions, and external events. It also highlights the need for a comprehensive understanding of these factors to make accurate financial forecasts.

5. The fifth part of the document discusses the importance of financial planning and the role of the accounting system in providing the necessary data for this process. It also highlights the need for a clear understanding of the organization's financial goals and the ability to adjust the plan as needed.

6. The sixth part of the document discusses the various methods used to evaluate financial performance, including the use of ratios and the importance of understanding the limitations of these measures. It also discusses the challenges associated with financial evaluation and the need for a comprehensive understanding of the organization's financial situation.

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11 Q. And why, at that time, did
12 Walmart decide that it needed additional
13 monitoring of oxycodone 30s?

14 A. We had received information
15 from a DEA agent that oxycodone 30 was on
16 their radar to be -- I mean, just to kind of
17 simplify.

18 That they had heightened
19 concerns about oxycodone 30. During that
20 meeting they indicated that Walmart was not a
21 focus of the concerns that they had, but we
22 wanted to proactively establish additional
23 due diligence to ensure that we didn't become
24 part of the DEA's concern around oxy 30.

[REDACTED]

[illegible]

[illegible]

17 MR. INNES: Why don't we do --
18 why don't we go off the record for a
19 minute.

20 THE VIDEOGRAPHER: 12:00 p.m.

21 We are off the video record.

22 (Recess taken, 12:00 p.m. to
23 12:44 p.m.)

24 THE VIDEOGRAPHER: 12:45. We
25 are on the video record.

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4. The fourth part of the document discusses the various factors that can affect financial performance, including changes in market conditions, management decisions, and external events. It also highlights the need for a comprehensive understanding of these factors and the ability to adapt to changing circumstances.

5. The fifth part of the document discusses the importance of financial planning and the role of the accounting system in providing the necessary data for this process. It also highlights the need for a clear understanding of the organization's financial goals and the ability to develop effective strategies to achieve them.

6. The sixth part of the document discusses the various methods used to evaluate financial performance, including the use of ratios and the importance of benchmarking. It also discusses the challenges associated with financial evaluation and the need for a comprehensive understanding of the organization's financial situation.

7. The seventh part of the document discusses the importance of financial reporting and the role of the accounting system in providing the necessary data for this process. It also highlights the need for transparency and accountability in financial reporting and the importance of understanding the limitations of these reports.

8. The eighth part of the document discusses the various factors that can affect financial performance, including changes in market conditions, management decisions, and external events. It also highlights the need for a comprehensive understanding of these factors and the ability to adapt to changing circumstances.

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10. The tenth part of the document discusses the various methods used to evaluate financial performance, including the use of ratios and the importance of benchmarking. It also discusses the challenges associated with financial evaluation and the need for a comprehensive understanding of the organization's financial situation.

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13 A. This was part of efforts that
14 we had ongoing. This was in the -- kind of
15 in the same time frame that we were hearing
16 about the oxy 30 issues from the DEA. I know
17 that there were actions taken against some of
18 our competitors around their dispensing
19 habits, and so we were seeing the issues
20 related to opioid use continuing to rise,
21 just coming from an environmental scan.

22 Q. Did you say opioid use or
23 opioid abuse?

24 A. I meant abuse, if ...

25 Q. So the reason why, in August of

1 2012, you believe the matter was urgent was
2 because of the conversations you had had with
3 the DEA regarding oxy 30 and the fines and
4 penalties that were leveled against folks who
5 were similarly situated to Walmart in the
6 dispensing and distribution of opioids.

7 MS. TABACCHI: Object to the
8 form.

9 THE WITNESS: Really what we
10 were -- what we were seeing as a
11 continuing issue related to the opioid
12 abuse.

13 Q. (BY MR. INNES) Okay. And you
14 mentioned that the DEA told you that they
15 weren't focused on Walmart in particular for
16 oxy 30s at that point in time; right?

17 A. That is correct.

18 Q. And these actions that you
19 referenced were brought against companies
20 other than Walmart? That's right?

21 A. Correct.

■ ■ ██
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15 MS. TABACCHI: Mike, before we
16 keep going, could we take another
17 break, please?

18 MR. INNES: You were done
19 answering that question? I'm sorry.

20 MS. TABACCHI: You were
21 finished; right?

22 THE WITNESS: I was.

23 MR. INNES: Sure, we can take a
24 break.

25 THE VIDEOGRAPHER: 1:54. We

1 are off the video record.

2 (Recess taken, 1:54 p.m. to
3 2:12 p.m.)

4 THE VIDEOGRAPHER: 2:12. We
5 are on the video record.

6 MR. INNES: Okay. We're back
7 on the record. There was a -- before
8 we start, Ms. Hiland, I'm just going
9 to make a statement on the record
10 here.

11 And correct me if I'm wrong,
12 Ms. Tabacchi, but there is a
13 discrepancy between what was
14 transcribed and perhaps what the
15 witness said occurring around 1:40, I
16 believe. We've agreed that we will
17 take care of that discrepancy via the
18 errata.

19 MS. TABACCHI: Correct. It's a
20 discrepancy between the word "would"
21 and "wouldn't." So we will -- we have
22 agreed that we will address it in the
23 errata.

24 Q. (BY MR. INNES) So let's march
25 forward. We'll see if we can't make sure

1 everyone makes their flights. Try to quicken
2 the pace a little bit.

[illegible]

A horizontal bar chart titled 'Percentage of respondents by age group' comparing the age distribution of men and women. The x-axis represents the percentage of respondents, ranging from 0% to 100% in 10% increments. The y-axis lists age groups from 18 to 75+. For each age group, there are two bars: a blue bar for men and a red bar for women. The data shows that men are more prevalent in the 18-24 and 25-34 age groups, while women are more prevalent in the 35-44 and 45-54 age groups. The percentage of respondents decreases significantly for both genders in the 55-64 and 65-74 age groups.

Age Group	Men (%)	Women (%)
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24 MS. TABACCHI: Mike, you know,
25 you've asked this question a number of

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[REDACTED]

13 Q. This isn't a game of gotcha.
14 I'm really just trying to figure it out.

15 MS. TABACCHI: Really?

16 MR. INNES: Other times it
17 might be.

18 Kidding.

[REDACTED]

[REDACTED]

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MS. TABACCHI: When we can.

1 MR. INNES: Are you done with
2 that answer?

3 THE WITNESS: Yes.

4 MR. INNES: Okay. Let's go off
5 the record and take a quick break.

6 THE VIDEOGRAPHER: 3:11. We
7 are off the video record.

8 (Recess taken, 3:11 p.m. to
9 3:33 p.m.)

10 THE VIDEOGRAPHER: 3:33. We
11 are on the video record.

12 MR. INNES: Okay. Hi,
13 Ms. Hiland. Welcome back.

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

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[illegible]

[illegible]

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█ [REDACTED] [REDACTED]

█ [REDACTED]

█ [REDACTED] [REDACTED]

4 October 24th, 2017. Remind me when Walmart
5 decided to exit the distribution --
6 self-distribution of Schedule II narcotics.

7 MS. TABACCHI: Object to the
8 form. Lack of foundation.

9 THE WITNESS: I don't know when
10 the decision was made. We exited in
11 April 2018 for C-IIs.

12 Q. (BY MR. INNES) Okay. Was that
13 all C-IIs?

14 A. Yes.

█ [REDACTED] [REDACTED] [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

[illegible]

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[illegible]

[illegible]

[illegible]

[illegible]

1 tripled from 76 million in 1991 to
2 approximately 207 million in 2013.

3 "The U.S. accounts for
4 80 percent of the world's consumption of
5 opioid painkillers and 99 percent of the
6 hydrocodone. This remarkable volume is
7 severely harming consumer health, costing the
8 country more than \$78 billion annually in
9 associated costs and taking a tragic toll on
10 countless individuals and society as a
11 whole."

12 Do you agree with the sum and
13 substance of that paragraph?

14 MS. TABACCHI: Object to the
15 form.

16 THE WITNESS: I don't have any
17 reason to dispute these as being
18 accurate.

19 Q. (BY MR. INNES) Okay. What's
20 interesting to me is that this paragraph
21 discusses opioid prescriptions. It doesn't
22 discuss opioid distribution, does it?

23 A. Not -- no.

■ **1. 1990年10月1日以前に建設された建築物**
 ■ **2. 1990年10月1日以後に建設された建築物**

[illegible]

[illegible]

[illegible]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED] [REDACTED]

6 MR. INNES: Can we go off the
7 record?

8 THE VIDEOGRAPHER: 4:35. We
9 are off the video record.

10 (Recess taken, 4:35 p.m. to
11 4:44 p.m.)

12 THE VIDEOGRAPHER: 4:45. We
13 are on the video record.

14 Q. (BY MR. INNES) Okay,
15 Ms. Hiland, we're back. We'll make one final
16 push. I think we can be quick about this.

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED] [REDACTED] [REDACTED]

■ [REDACTED]

1. The first part of the document discusses the importance of maintaining accurate records of all transactions and activities. It emphasizes the need for transparency and accountability in financial reporting.

2. The second part of the document outlines the various methods used to collect and analyze data. It includes a detailed description of the sampling process and the statistical techniques employed.

3. The third part of the document presents the results of the study. It includes a series of tables and graphs that illustrate the findings of the research.

4. The fourth part of the document discusses the implications of the findings for policy and practice. It highlights the need for further research and the importance of implementing the findings in a timely and effective manner.

5. The fifth part of the document provides a conclusion and a summary of the key findings. It also includes a list of references and a list of appendices.

6. The sixth part of the document provides a detailed description of the methodology used in the study. It includes a list of the data sources and a description of the statistical software used.

7. The seventh part of the document provides a detailed description of the results of the study. It includes a list of the findings and a discussion of their implications.

8. The eighth part of the document provides a detailed description of the conclusions and recommendations of the study. It includes a list of the key findings and a discussion of their implications.

9. The ninth part of the document provides a detailed description of the references and appendices. It includes a list of the sources used in the study and a list of the additional materials provided.

10. The tenth part of the document provides a detailed description of the overall structure and organization of the document. It includes a list of the sections and a description of the content of each section.

■

[REDACTED]

■

[REDACTED]

3

MR. INNES: Okay. I have no

4

further questions.

5

Do you guys have any questions?

6

Anyone here?

7

MS. TABACCHI: We have no

8

questions for the witness.

■

[REDACTED]

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We would also like to hold it

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open because we believe there were

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certain areas of documents -- and

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we'll send you a letter on this as

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and we'd like to question Ms. Hiland

23

on. And we can -- we can put that in

24

a letter too as well.

25

MS. TABACCHI: We can agree to

1 disagree as to certain aspects of
2 that. But I appreciate your statement
3 for the record, and I think we're
4 concluded for today.

5 MR. INNES: Okay.

6 MS. TABACCHI: Thank you.

7 MR. INNES: Thank you.

8 THE VIDEOGRAPHER: 4:48. We
9 are off the video record. This
10 concludes the video deposition.

11 (Proceedings recessed at
12 4:48 p.m.)

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CERTIFICATE

I, DEBRA A. DIBBLE, Registered
Diplomate Reporter, Certified Realtime
Reporter, Certified Realtime Captioner,
Certified Court Reporter and Notary Public,
do hereby certify that prior to the
commencement of the examination, SUSANNE
HILAND was duly sworn by me to testify to the
truth, the whole truth and nothing but the
truth.

I DO FURTHER CERTIFY that the
foregoing is a verbatim transcript of the
testimony as taken stenographically by and
before me at the time, place and on the date
hereinbefore set forth, to the best of my
ability.

I DO FURTHER CERTIFY that pursuant
to FRCP Rule 30, signature of the witness was
not requested by the witness or other party
before the conclusion of the deposition.

I DO FURTHER CERTIFY that I am
neither a relative nor employee nor attorney
nor counsel of any of the parties to this
action, and that I am neither a relative nor
employee of such attorney or counsel, and
that I am not financially interested in the
action.

DEBRA A. DIBBLE, RDR, CRR, CRC
NCRA Registered Diplomate Reporter
NCRA Certified Realtime Reporter
Certified Court Reporter

Dated: 23 January 2019

1 INSTRUCTIONS TO WITNESS

2
3 Please read your deposition over
4 carefully and make any necessary corrections.
5 You should state the reason in the
6 appropriate space on the errata sheet for any
7 corrections that are made.

8 After doing so, please sign the
9 errata sheet and date it.

10 You are signing same subject to
11 the changes you have noted on the errata
12 sheet, which will be attached to your
13 deposition.

14 It is imperative that you return
15 the original errata sheet to the deposing
16 attorney within thirty (30) days of receipt
17 of the deposition transcript by you. If you
18 fail to do so, the deposition transcript may
19 be deemed to be accurate and may be used in
20 court.

	ERRATA		
	PAGE	LINE	CHANGE
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24		REASON:	_____
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1 ACKNOWLEDGMENT OF DEPONENT

2
3
4 I, SUSANNE HILAND, do hereby
5 certify that I have read the foregoing pages
6 and that the same is a correct transcription
7 of the answers given by me to the questions
8 therein propounded, except for the
9 corrections or changes in form or substance,
10 if any, noted in the attached
11 Errata Sheet.
12

13 _____
14 SUSANNE HILAND

DATE

15 Subscribed and sworn to before me this
16 _____ day of _____, 20 ____.

17 My commission expires: _____
18

19 _____
20 Notary Public
21
22
23
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	LAWYER'S NOTES		
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